

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Steven B. Jenkins-Edwards	:	Case No.: 18-17642(AMC)
	:	
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Steven B. Jenkins-Edwards, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about November 16, 2018.
2. The Chapter 13 filing was assigned case number 18-17642.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 5, 2019.
4. On or about February 5, 2020 the Chapter 13 Trustee filed a Motion to Dismiss for Failure to Make Payments.
5. Due to the coronavirus, the Debtor, a poker dealer, has been furloughed indefinitely.
6. Furthermore, a major casino in the Philadelphia area, has completely removed their poker rooms from the floor, replaced them with slot machines and terminated their poker dealers.
7. Due to this information, the Debtor is concerned his employer will make the same changes and will be unable to return to work at his current position and salary.
8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", is affordable by the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: July 15, 2020

/s/Brad J. Sadek, Esq
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